

REMARKS

The Office Action mailed on April 8, 2004, has been carefully reviewed and the foregoing amendments and following remarks are offered in response thereto.

The Examiner objected to the drawings as containing terms in a language other than English. The Examiner is kindly directed to the Proposed Drawing Corrections, filed on March 23, 2001, in which these objectionable terms were corrected. A copy of the Proposed Drawings Corrections, and a date-stamped postcard identifying the filing, is attached. The title of the invention has been amended in response to the Examiner's objection.

Without acceding to the rejections under 35 U.S.C. § 102, Claims 11 and 23 have been amended to more clearly recite certain distinctive features of the invention. Claims 12–22 and 24, 26 have been amended to conform to amended Claims 11 and 23, respectively. Claim 25 has been canceled without prejudice to the underlying subject matter.

Applicants respectfully submit that the rejections under 35 U.S.C. § 102 are inappropriate, at least insofar as considered vis-à-vis the claims as now presented.

Reid (USP 6,182,226) is directed to a method for controlling interactions between networks using firewalls with defined regions. Reid discloses that server 18 and workstations 20, connected to internal network 12, communicate with other servers and workstations on external network 16 through firewall 14, which implements a region-based security system. *See, e.g., Col. 1, lines 54–56; Col. 2, line 59 to Col. 3, line 10; FIGS. 1a and 1b.* Reid defines regions as “groupings of physical interfaces (network cards) and virtual networks (VPNs) into entities of similar trust” (Col. 4, lines 51–53). Reid discloses that regions are protected from each other by firewalls, and access control rules, used by each firewall to allow or denied a particular connection request, are created using decision trees. *See, e.g., Col. 5, lines 28–65.*

Claim 11, as amended, recites, *inter alia*, defining internal and external protection domains for each firewall that include at least one zone having at least one access-controlled network resource, and creating a plurality of resource groups that each have at least one zone. Claim 23, as amended, recites similar subject matter. Applicants submit that Reid fails to teach or suggest the claimed features. Rather, Reid discloses that a region may group together one or more networks or VPNs that require the same type of access. *See, Col. 5, lines 3–14.* Claim 11 also recites, *inter alia*, specifying an access control rule, including a scope, for each resource group, and determining whether to apply the access

control rule specified for the resource group associated with the destination network resource based on the scope of the access control rule. Claim 23, as amended, recites similar subject matter. Applicants submit that Reid fails to teach or suggest the claimed features. Instead, Reid discloses that access control rules include various decision nodes which determine whether a connection request is allowed or denied. *See*, e.g., Col. 5 line 27 to Col. 7 line 58.

Accordingly, Applicants submit that the rejections under 35 U.S.C. § 102 are untenable and should be withdrawn.

In view of the amendments presented herein, and the reasons explained in the preceding remarks, Applicants submit that this application is in condition for allowance and should now be passed to issue.

A Notice of Allowance is respectfully solicited.

If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested. The Commissioner is hereby authorized to charge any fees and to credit any overpayments that may be required by this paper under 37 C.F.R. §§ 1.16 and 1.17 to Deposit Account No. 50-1165.

Respectfully submitted,

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